

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

VALERIE C. SCHMITZ, individually and as  
Personal Representative of the ESTATE OF DAVID  
J. SCHMITZ, deceased,

Plaintiffs,

v.

LOCKHEED MARTIN CORPORATION,  
ROCKWELL COLLINS, INC.,  
TELEDYNE RISI, INC., d/b/a TELEDYNE  
ELECTRONIC SAFETY PRODUCTS and  
TELEDYNE RISI, INC., d/b/a TELEDYNE  
ENERGETICS,

Defendants.

Case No. 3:22-cv-02419-MGL

**JOINT MOTION FOR ENTRY OF  
PROTECTIVE ORDER**

Plaintiff Valerie C. Schmitz, individually and as Personal Representative of the Estate of David J. Schmitz, deceased, and Defendants Lockheed Martin Corporation, Rockwell Collins, Inc., Teledyne Risi Inc., d/b/a Teledyne Electronic Safety Products, and Teledyne Risi, Inc., d/b/a Teledyne Energetics (collectively “the Parties”); by and through their undersigned attorneys, jointly move the Court pursuant to Fed. R. Civ. P. 26(c) and Local Civ. Rule 26.08 (D.S.C.), for entry of a Protective Order for the reasons discussed below.

The Parties contemplate that discovery in the above-captioned action (the “Action”) will involve the exchange of information, and the production of documents or other materials by the Parties and certain third-parties (to include the U.S. Government), which may contain information in the nature of personal information, trade secrets, export-controlled information or documents, or information otherwise of confidential, regulated, or proprietary nature that are in the possession, custody, or control of one of the Parties or a third-party; and

In order to establish procedures that would, among other things, protect the Parties from public disclosure of such confidential, trade secret, or export-controlled information or

documents, the Parties agree to limit the disclosure and dissemination of such materials that are in the possession, custody, or control of one of the Parties or a third-party, while at the same time allowing the Parties to obtain discovery thereof under the terms and conditions set forth in the attached proposed Protective Order. Moreover, a protective order will also expedite the flow of discovery materials, protect the integrity of truly confidential or regulated information, promote the prompt resolution of disputes over confidentiality, and facilitate the preservation of material worthy of protection. The proposed Protective Order, which is intended to supplement the Protective Order previously filed in this case as Dk #77, is requested by consent of all parties.

**WE SO MOVE/CONSENT**

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